

WELLS FARGO BANK, N.A. has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

File with the Court an answer, explaining your position at:

**Clerk  
U.S. Bankruptcy Court  
402 E. State Street  
Trenton, NJ 08608**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC	ALBERT RUSSO, Trustee
400 Fellowship Road, Suite 100	CN 4853
Mt. Laurel, NJ 08054	TRENTON, NJ 08650-4853

Attend the hearing scheduled to be held on 07/24/2018 in the TRENTON Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court  
402 E. State Street  
Trenton, NJ 08608**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: June 28, 2018

/s/ Sherri J. Smith  
Sherri J. Smith, Esq.  
Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054  
Tel: 856-813-5500 Ext. 47923  
Fax: 856-813-5501  
Email: Sherri.Smith@phelanhallinan.com

**File No. 810951**

Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road  
Mt. Laurel, NJ 08054  
856-813-5500  
FAX Number 856-813-5501  
WELLS FARGO BANK, N.A.

In Re:

DENA BONFONTI

Debtor

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE

Chapter 13

Case No. 18-20299 - MBK

Hearing Date: 07/24/2018

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, WELLS FARGO BANK, N.A., the holder of a Mortgage on debtor's residence located at 24 CHAMBORD CT, HAMILTON, NJ 08619-4703 hereby objects to the Confirmation of the debtor's proposed Chapter 13 Plan on the following grounds:

1. Movant is WELLS FARGO BANK, N.A.
2. Debtor, DENA BONFONTI is the owner of the property located at 24 CHAMBORD CT, HAMILTON, NJ 08619-4703.
3. Movant is in the process of drafting and filing a Proof of Claim. The approximate arrears are \$4,893.62.
4. The Debtor's Schedules indicate that the Debtor has a 1<sup>st</sup> mortgage and 2nd home equity account both held by Movant. The Debtor's proposed Chapter 13 Plan under Part 4, Section B does not provide for payment of arrears to Movant. It is assumed the Debtors are seeking to strip off the 2nd lien. Movant has equity in the account. The proposed Chapter 13 Plan should list the last four digits of the liens that are being affected.
5. Debtor's Plan does not propose to cure arrears due to Movant's first mortgage lien through the plan. Movant objects to the proposed Chapter 13 Plan.
6. Debtor's Plan currently fails to adequately provide for arrears owed to Movant. Confirmation of Debtor's proposed Plan should be denied.

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that the Confirmation of Debtor's Plan be denied.

/s/ Sherri J. Smith  
Sherri J. Smith, Esq.  
Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054  
Tel: 856-813-5500 Ext. 47923  
Fax: 856-813-5501  
Email: Sherri.Smith@phelanhallinan.com

Dated: June 28, 2018

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

810951  
Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054  
856-813-5500  
Attorneys for WELLS FARGO BANK, N.A.

In Re:

DENA BONFONTI

Case No: 18-20299 - MBK

Hearing Date: 07/24/2018

Judge: MICHAEL B KAPLAN

Chapter: 13

**CERTIFICATION OF SERVICE**

1. I, Shannon N. Ettl:

☐ represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents WELLS FARGO BANK, N.A. in the above captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

2. On June 28, 2018 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 28, 2018

/s/ Shannon N. Ettl  
Shannon N. Ettl

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
DENA BONFONTI 24 CHAMBORD COURT HAMILTON, NJ 08619	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
DENA BONFONTI 24 CHAMBORD CT HAMILTON, NJ 08619-4703	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
KEVIN C. FAYETTE, ESQUIRE 1675 WHITEHORSE MERCERVILLE ROAD SUITE 204 HAMILTON, NJ 08619	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
ALBERT RUSSO, TRUSTEE CN 4853 TRENTON, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
U.S. TRUSTEE US DEPT OF JUSTICE OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail

NEWARK, NJ 07102		<input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
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\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.